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Plaintiff in Pro Per

6
7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,

11 Plaintiff,

12 vs.

13 RIOT GAMES, INC.,

14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S PRE-LITIGATION
DISCOVERY REQUESTS AND RULE 26(F)
CONFERENCE PREPARATION

15 Dated this: FEBRUARY 2025

16
17 *M.WOLSTENHOLME.*
18 [MARC WOLSTENHOLME]

1 **PLAINTIFF'S PRE-LITIGATION DISCOVERY REQUESTS AND RULE 26(F)**
2 **CONFERENCE PREPARATION**
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4

5 Dear Josh, Aron, and Team at Greenberg Glusker LLP,
6
7

8 Further to my previous correspondence with Josh on 2 January 2025, in which I
9 shared a preliminary list for pre-litigation discovery, I am providing an updated and more
10 detailed list of items for consideration ahead of our Rule 26(f) conference under the Federal
11 Rules of Civil Procedure (FRCP). I hope this document will assist in preparing for our meeting
12 scheduled for 13 February 2025 via Zoom.

13
14 Additionally, I request that Riot Games facilitate and cover the costs of my travel
15 to Los Angeles to accommodate any in-person meetings that may be required.
16

17
18 Below, I outline the specific information and materials I request to be disclosed or
19 addressed:

20
21 **1. Development Timeline and Evidence**

22
23 1.1 Provide a full and accurate timeline, with supporting evidence, of the
24 development of Arcane. This will be cross-referenced with evidence I hold.

25 1.2 I have reason to believe that Arcane (in its Bloodborg form) was greenlit by
26 Nicolo Laurent in mid-2020 and development commenced shortly thereafter.

1 1.3 Provide a detailed timeline and evidence of the creation of Riot's 10th
2 Anniversary video, reportedly developed at Fortiche (Paris) in the summer of 2019 as part of an
3 effort to test audience interest and secure early backing for the series. This includes:
4
5

6 A list of all individuals and companies involved in producing this video.
7
8

9 Dates, roles, and responsibilities for all contributors.
10
11

12 **2. Music Video Timeline**

13 2.1 Provide a timeline of the development of the Blood, Sweat & Tears music
14 video featuring Sheryl Lee Ralph, including all storyboard and production materials.
15
16

17 **3. Riot Forge Submissions**

18 3.1 Provide a comprehensive list of all submissions made to Riot Forge, including
19 my Bloodborg submissions dated 15 and 19 April 2020.
20
21

22 **4. Involvement of Agents, Agencies, and Talent**

23 4.1 A full list of external agents, agencies, and individuals involved in Arcane,
24 including:
25
26

27 Manuscripts solicited.
28

29 Writers, directors, casting agents, and managers consulted.
30
31

32 Correspondence between Riot Games, Fortiche, Netflix, and other parties.
33
34

1 4.2 Provide a complete list of voice actors, the agencies representing them, and
2 details of their casting processes. Specifically:

3 Dates, timelines, and financial records for all casting decisions.

4 Statements from cast members regarding their experience, including what they
5 were told about the material's origins.

6 Copies of all Non-Disclosure Agreements (NDAs).

7 4.3 Investigate the involvement of UTA and Curtis Brown Group, who
8 represented key talent in Arcane:

9 Hailee Steinfeld (Vi) – Represented by UTA.

10 Ella Purnell (Jinx) – Represented by Curtis Brown.

11 Katie Leung (Caitlyn Kiramman) – Represented by Curtis Brown.

12 Harry Lloyd (Viktor) – Represented by Curtis Brown.

13 Provide a breakdown of how these agencies secured the largest roles in the show,
14 including all financial transcripts, receipts, and other relevant documentation.

15

16 **5. Development Metadata**

17 5.1 A record of all email addresses, metadata, and computers used to access
18 Arcane-related files.

19

20 **6. Personnel Involvement**

21 6.1 Provide a complete list of individuals and their job roles who worked on
22 Arcane, including:

1
2 Riot Games employees.
3
4 Fortiche Production SAS.
5
6 Netflix and Tencent Games.
7 Curtis Brown and UTA.
8 Third-party contractors.
9 6.2 Minutes of meetings related to Arcane, including board meetings that
10 approved the show.

11
12 **7. Financial and Tax Information**

13 7.1 A comprehensive financial breakdown of Arcane, including:

14
15 Production costs.
16 Tax breaks claimed.
17 Pay statements and receipts.

18
19
20 **8. Correspondence and Evidence Preservation**

21 8.1 Correspondence of key personnel, including:
22
23 Christian Linke.
24 Alex Yee.
25 Rowan Parker.

1 Nicolo Laurent.

2 Jonny Geller.

3 Felicity Blunt.

4 David Lyerly.

5 Melinda Rediger

6 And all others.

7

8

9 **9. Additional Requests**

10 9.1 Access to Riot Games and Fortiche Production servers for data mining

11 purposes.

12 9.2 A timeline for interviews with employees of Riot Games and Fortiche

13 Production.

14 9.3 A copy of all Bloodborg-related materials pinned in writing and storyboard

15 rooms.

16 9.4 A list of cast members under 18 and their parental consent forms.

17 9.5 An anonymous questionnaire for employees involved in Arcane to address key

18 concerns.

19

20

21

22 **10. Complaints and Investigations**

23 10.1 An official response to the summons sealed on 11 May 2024.

24 10.2 Updates on Riot Games' investigations into hate mail I have received from

25 Rioters, Fortiche employees, and the wider community.

1 10.3 A response to allegations regarding Christian Linke's conduct and the
2 appropriateness of his comments about the "French guillotine."
3
4

5 I hope this document aids in preparing for our Meet and Confer discussion. Below
6 I have provided a checklist, and my notes have been provided to the email.

7 As mentioned previously, I am open to early out-of-court settlements, yet because
8 of the ongoing toll and time proceedings are having on myself and on the M.W. Wolf catalogue,
9 which I haven't worked on since mid- 2024, my lower end of negotiations has shifted to
10 accommodate the extra compensation. I am also willing to assist Riot Games by addressing gaps
11 in their lore and products, provided the ongoing misuse of my intellectual property ceases.
12

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14 Thank you for your attention. I look forward to your response and our meeting.
15

16 Kind regards,
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18 Marc Wolstenholme
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1 **CHECKLIST FOR PRE-LITIGATION DISCOVERY REQUESTS**
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4 **1. Development Timeline & Production Evidence**
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6 □ Provide a complete and accurate timeline of Arcane's development, including
7 documentation from all stages.
8

9 □ Provide all evidence related to the conceptualization and greenlighting of
10 Arcane (including Bloodborg references) by Nicolo Laurent and other decision-makers.
11

12 □ Provide a breakdown of all failed projects and pilot materials that were
13 reworked into Arcane.
14

15 □ Provide all internal communications discussing audience testing and feasibility
16 studies for Arcane, including:
17

18 The 10th Anniversary Video (produced at Fortiche, Paris in Summer 2019).
19

20 Marketing strategies used to test audience engagement.
21

22 □ Provide all drafts, storyboards, design documents, and concept art that led to
23 the final form of Arcane.
24

25 □ Provide all Riot Games board meeting minutes discussing the approval and
26 financing of Arcane.
27

28 □ Provide all Riot Games internal memos, emails, or Slack communications
referencing the show's production.
29

30 Add notes...
31

1 **2. Copyright & Ownership Evidence**

2 Provide a complete list of all Riot Forge submissions, including my Bloodborg
3 submissions on 15 and 19 April 2020.

4 Provide any Riot Games internal correspondence discussing Riot Forge
5 submissions and potential adaptation of external ideas.

6 Provide documentation of all Riot Games personnel who reviewed or had
7 access to Riot Forge submissions.

8 Provide a complete list of all agencies, external writers, and consultants hired
9 for Arcane, including their contracts and agreements.

10 Provide correspondence between Riot Games and any external agencies (UTA,
11 Curtis Brown Group, etc.) discussing story development and character arcs.

12 Provide all correspondence Riot had with Curtis Brown Group and UTA
13 regarding potential writing or creative contributions.

14 Provide all Riot Games internal communications discussing the adaptation of
15 new lore elements from external submissions or manuscripts.

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17 Add notes...
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2 **3. Casting & Talent Agency Involvement**
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5 Provide the full list of Arcane voice actors, their agencies, and their contracts.
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7 Provide records of how each major character was cast, including the selection
process and agency involvement.

8 Provide a detailed financial breakdown of payments to talent agencies (Curtis
9 Brown, UTA, etc.) and their clients.

10 Provide all NDAs signed by cast members regarding their roles, storylines, and
11 production details.

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13 Add notes...
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1 **4. Digital Evidence & Metadata Requests**

- 2 Provide a full record of email addresses and devices (including metadata logs)
3
4 that accessed or edited files related to Arcane.
5 Provide all Riot Games internal server logs related to Arcane's development.
6 Provide all project folders, drafts, and notes pinned in Riot Games HQ and
7 Fortiche Production's writing rooms.
8
9 Provide records of who was granted access to Bloodborg materials at Riot
10 Forge or other agencies.

11
12 **5. Financial & Legal Documents**
13

- 14 Provide a full breakdown of Riot Games' production budget and financial
15 statements for Arcane.
16 Provide records of tax breaks, subsidies, or external investments related to
17
18 Arcane.
19 Provide all Riot Games employee NDAs, contracts, and agreements related to
20 Arcane.
21 Provide an itemized list of all expenditures tied to talent recruitment and
22
23 agency involvement.

24 Add notes...

1 **6. Pre-Litigation Conduct & Bad Faith Actions**

- 2 Provide all internal Riot Games communications discussing the plaintiff's
3 claims or legal strategy.
- 4
- 5 Provide documentation of Riot's refusal to engage in good faith pre-litigation
6 discovery.
- 7 Provide copies of all communications threatening to dismiss the case instead of
8 addressing claims.
- 9
- 10 Provide all internal Riot Games legal correspondence regarding this lawsuit,
11 including discussions on legal tactics to suppress evidence.

12

13 Add notes...

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1 **7. Hate Mail & Workplace Culture Investigations**

- 2 Provide all reports, investigations, or internal Riot Games discussions related to
3
hate mail received by the plaintiff.
4
5 Provide all internal Riot Games documents discussing harassment or a toxic
6
workplace culture related to Arcane's development.

7
8 **8. Procedural & Legal Accommodations**

- 9
10 Ensure the plaintiff's legal disability accommodations and pro se status are
11 acknowledged.
12 Provide all Riot Games communications discussing procedural delays or efforts
13 to exhaust the plaintiff legally.

14
15 Add notes...

1 **9. Witness & Expert Testimonies**

2 Provide a full list of individuals who worked on Arcane, their roles, and their
3 availability for testimony.

5 Provide any independent third-party forensic experts who can verify metadata
6 and authorship claims.

7 Provide witnesses from literary agencies who can confirm ownership of
8 Bloodborg.

10 **10. Additional Motions & Discovery Requests**

11 Grant the plaintiff access to Riot Games and Fortiche Production SAS servers
12 for forensic analysis.

14 Provide a timeline for employee interviews regarding Arcane's development.

15 Allow a neutral third party to conduct an anonymous questionnaire among Riot
16 Games and Fortiche employees about Arcane's development process.

18 Provide an official response to the court summons filed on 11 May 2024.

19 Provide a response to allegations regarding Christian Linke's public statements
20 condoning violence (e.g., "French Guillotine" comment).

23 Add notes...

1 **Final**

2 I have provided ample time for the opportunity to respond, comply, or refuse.
3 However, given the scope and breadth of the information, if extra time is needed, I understand,
4 so long as you effectively communicate this with me.

5 If you ignore or refuse the request, then I will be escalating the matter to the court.

6
7
8 Thank you for your cooperation.

9
10 The Plaintiff, Marc Wolstenholme, M.W. Wolf.

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12 Date: February 5, 2025

13 Signed: *M.WOLSTENHOLME.*